

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

Petition to Amend Part 68
of the Commission's Rules
to Include Terminal
Equipment Connected to
Basic Rate Access Service
Provided via Integrated
Services Digital Network
Access Technology

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CC Docket No. 93-268

Petition to Amend Part 68
of the Commission's Rules
to Include Terminal
Equipment Connected to
Public Switched Digital
Service

RM-7815

RM-6147

Correction of Part 68
Typographical Errors,
Clarifications and a
Proposal for Part 68
Registration Revocation
Procedures

BELL ATLANTIC'S¹ COMMENTS

Bell Atlantic supports the Commission's proposal to
incorporate interconnection standards for terminal equipment
used in connection with Integrated Services Digital Network
("ISDN") services and Public Switched Digital Service ("PSDS")

¹ The Bell Atlantic Telephone Companies ("Bell Atlantic")
are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.;
Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania,
Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington,
D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

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into the Part 68 rules.² Incorporating these new public switched services into the existing rules will eliminate some of the uncertainty regarding the standards that equipment manufacturers should follow when developing equipment for these new services.

I. PART 68 SHOULD INCLUDE ISDN TERMINAL EQUIPMENT.

Bell Atlantic agrees with the Commission that the rules should address terminal equipment connected to both Basic Rate Access ("BRA") and Primary Rate Access ("PRA") ISDN services.³ Inclusion of ISDN under Part 68 will help to ensure the mass market deployment of ISDN, and thus meet the Commission's goals of promoting "development of ISDN terminal equipment, industry uniformity, and worldwide compatibility."⁴ However, no new specifications are needed to address PRA, because the requirements for PRA connections are the same as those for T1 (1.544 Mbps) connections, and thus are already included in the rules.

² 47 C.F.R. Part 68. *See Notice of Proposed Rulemaking*, FCC 93-484 (rel. Nov. 22, 1993) ("Notice"), supplemented by *Errata*, and *Order Extending Comment Period*, DA 94-46 (rel. Jan. 12, 1994).

³ Notice at ¶ 3.

⁴ *Id.*

II. THE RULES SHOULD REFLECT A METALLIC-TO-LONGITUDINAL BALANCE REQUIREMENT.

We concur with the Commission's proposal that the new rules should reflect a metallic-to-longitudinal ("M-L") balance requirement for equipment connected to the ISDN interface.⁵ An M-L balance requirement addresses crosstalk interference, a potential source of harm to the network, and is therefore within the purview of Part 68. The Commission appropriately rejected use of a longitudinal-to-metallic methodology, which is a performance, not an interference, measure, and therefore is not appropriately in Part 68.⁶

III. THE COMMISSION SHOULD NOT MANDATE USE OF A PARTICULAR TYPE OF CONNECTOR.

The FCC solicits comment on the types of plug and jack connectors to be used with ISDN and PSDS terminal equipment. It asks whether an eight-position connector should be required for ISDN BRA and whether to approve use of the eight-position SJA-11 connector proposed by US WEST.⁷

The Commission's existing rules provide a flexible approach for determining the types of connectors to use to interconnect carrier networks, premises wiring, and terminal

⁵ *Id.* at ¶ 4.

⁶ *Id.*

⁷ *Id.* at ¶ 6.

equipment.⁸ Those rules do not require the use of a particular connector for a specific service. They specify only that equipment must be connected to the network through a connector which conforms to Part 68, Subpart F, or which comply with Section 68.104 requirements and are described in nationwide telephone tariffs.⁹ As a result, a variety of approved connectors are available for use in the network. For example, while the RJ11C (six-position) connector is the most popular connector for use with switched telephone service and telephone sets, it is not the only one employed. There are at least 20 different connectors currently approved for use with switched telephone service.

There is nothing unique about ISDN or PSDS that would justify a less flexible approach. Many telephone companies and manufacturers of ISDN BRA sets use the standard RJ11C jack, the ECSA's T1 Committee supports its use for both ISDN and PSDS. Mandating the use of an eight-position connector for ISDN, as US WEST proposes, would eliminate the flexibility that telephone companies, manufacturers, and customers currently enjoy for ISDN demarcation points, inside wiring, and terminal equipment. Therefore, the Commission should approve use of an eight-position connector, but its use should

⁸ See 47 C.F.R. Part 68, Subpart F and § 68.104.

⁹ 47 C.F.R. § 68.104 (a) and (c).

remain optional.¹⁰ There is no evidence of any past harm from this flexible policy and the Commission should extend it to ISDN and PSDS.

IV. BELL ATLANTIC SUPPORTS THE PROPOSED PART 68 REGISTRATION REVOCATION PROCEDURES.

Bell Atlantic supports the FCC's proposed revocation procedures. As the Commission indicates, it would not be in the public interest to continue to authorize a piece of terminal equipment under Part 68 if authorization was obtained by fraud or if use of such equipment might result in harm to

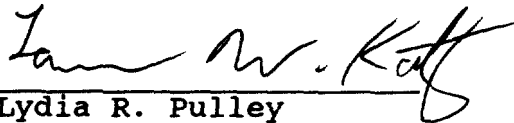
¹⁰ If the Commission approves an eight-position connector, it should do so by approving the RJ49C jack, which is identical in all respects to the SJA-11. Historically, registration jacks have been assigned Universal Service Order Codes (USOCs) beginning with the designation "RJ". Approval of the RJ49C jack instead of the SJA-11 will eliminate potential confusion in the industry.

the network. The Commission should notify the industry by Public Notice of the revocation of the registration of any terminal equipment.¹¹

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

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¹¹ Bell Atlantic also supports AT&T's technical proposals relating to ISDN set out in paragraph 5 of the Notice.